

EXHIBIT N

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim no. QB-2020-002492

BEFORE THE HONOURABLE MRS JUSTICE TIPPLES
DATED FRIDAY 24 JULY 2020

B E T W E E N : -

STOKOE PARTNERSHIP SOLICITORS

and

(1) MR PATRICK TRISTRAM FINUCANE GRAYSON
(2) GRAYSON + CO. LIMITED
(3) MR STUART ROBERT PAGE
(4) PAGE CORPORATE INVESTIGATIONS LIMITED



QB Defendants

CONSENT ORDER

PENAL NOTICE

IMPORTANT

IF YOU PATRICK GRAYSON OR GRAYSON + CO. LIMITED DISOBEY THIS ORDER (AND/OR THE UNDERTAKINGS RECORDED TO IN IT) YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND YOU, OR YOUR DIRECTORS, MAY BE SENT TO PRISON, FINED OR HAVE YOUR ASSETS SEIZED.

UPON the application of the Claimant by application notice dated 17 July 2020;

AND UPON the First and Second Defendants giving the undertakings which are set out in Schedule A hereto, the Claimant giving the undertaking set out in Schedule B hereto, and the Court accepting those undertakings;

AND UPON the Claimant and the First and Second Defendants agreeing the terms of this Order;

AND UPON reading the Witness Statement of Haralambos Tsiattalou dated 17 July 2020;

AND UPON the Claimant and the First and Second Defendants consenting to the terms of this Order and the undertakings set out in Schedule A and Schedule B

BY CONSENT IT IS ORDERED THAT:

USE OF INFORMATION AND DOCUMENTS

1. The Claimant is permitted to use the information and documents provided by the First and Second Defendants pursuant to the undertakings in Schedule A to this Order for the purpose of legal proceedings (if so advised) to identify, trace and seek damages against wrongdoers, to protect its Confidential Information and to trace its use, and to seek damages or such other relief as the Court may think fit. The information and documents provided by the First and Second Defendants may also be used in the legal proceedings brought by Mr Karam Al Sadeq under claim number QB-2020-000322.

CONFIDENTIALITY

2. No person shall obtain a copy of the confidential exhibit to the witness statement of Haralambos Tsiattalou dated 17 July 2020 without the permission of a High Court Judge. Any such application shall be made on no less than 3 clear days' notice in writing to all parties to this action.

COSTS

3. The costs of and occasioned by the Claimant's application against the First and Second Defendants are reserved.

SCHEDULE A

Undertakings given to the Court by the First and Second Defendants

DEFINITIONS

A1. For the purposes of these undertakings:

- 1.1. "Confidential Information" shall mean any information sourced or derived, in whole or in part, from any document, whether paper or electronic, that has been obtained from the Claimant without its authority and is either designated as confidential, or is evidently confidential by reason of its subject-matter or the manner in which it has been obtained.
- 1.2. "Confidential Information" shall include, but shall not be limited to: (i) the Claimant's banking records, accounts and statements; (ii) the Claimant's telephone records, accounts and statements; and (iii) documents which have not been published and which, on their face, relate to the conduct of legal proceedings on behalf of Mr Karam Al Sadeq.

ACCESSING OR OBTAINING CONFIDENTIAL INFORMATION

A2. Until the discharge of this undertaking by the Court, the First and Second Defendants undertake not to make any attempt to access or obtain Confidential Information from the Claimant.

USING OR DISSEMINATING CONFIDENTIAL INFORMATION

A3. Until the discharge of this undertaking by the Court, the First and Second Defendants undertake not to use, publish, communicate or disclose to any other person any Confidential Information, other than: (i) by way of disclosure to legal advisers instructed in relation to these legal proceedings for the purpose of obtaining legal advice in relation to these proceedings; (ii) for the purpose of carrying this undertaking into effect; (iii) with the written permission of the Claimant; or (iv) with permission of the Court.

AFFIDAVIT PROVIDING INFORMATION

A4. By no later than 4.30pm on 29 July 2020, the First and Second Defendants undertake to swear an affidavit stating on oath:

- 4.1. the identity of any person who has requested him to obtain Confidential Information from or pertaining to the Claimant, directly or indirectly;
- 4.2. (i) the manner in which the communication took place, (ii) the gist of the requests made, (iii) whether the requests were in writing, and (iv) if in writing, providing a copy if one exists in the possession or control of the Defendant;
- 4.3. what, if any, Confidential Information originating from the Claimant was obtained;
- 4.4. the use, if any, of the Confidential Information, identifying any person to whom it has been provided and in respect of each such person stating: (i) when, (ii) where, and (iii) how the Confidential Information was provided, and (iv) for what purpose; and
- 4.5. the treatment, if any, of the Confidential Information, identifying any steps taken in relation to its handling, storage, preservation and/or destruction.

INTERPRETATION

A5. A Defendant who is an individual who undertakes not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.

A6. A Defendant which is not an individual which undertakes not to do something must not do it itself or by its directors, officers, partners, employees or agents or in any other way.

A7. In this Schedule, the words “he”, “him” or “his” include “she” or “her” and “it” or “its”.

SCHEDULE B

Undertaking given by the Claimant

B1. If the Court later finds that this Order has caused loss to the First and/or Second Defendants and decides that they should be compensated for that loss, the Claimant will comply with any Order the Court may make.

Signed: The Honourable Mrs Justice Tipples DBE

Dated: Friday 24 July 2020

Service of the Order:

To: Stokoe Partnership Solicitors, for the Claimant (Ref: AWN001/003/BT

And to: BDB Pitmans LLP, for the First and Second Defendants (Ref: TPC/200994.0001)